

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

SRC Holding Corporation,  
SRC Investments Corporation,  
Securities Resolution Corporation

Debtors.

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BKY Case Nos. 02-40284  
02-40285  
02-40286

**TRUSTEE'S MOTION AND FIRST OBJECTION TO CLAIMS IDENTIFIED ON  
EXHIBITS A-1, A-2, AND A-3 ATTACHED HERETO**

1. Brian F. Leonard, the duly appointed and acting Chapter 7 Trustee, by and through his undersigned counsel, brings this Motion and Objection to various claims, and gives Notice of Hearing.

2. A hearing on this Motion will be held before the Honorable Nancy C. Dreher on the 9th day of August, 2006 at 10:30 o'clock a.m. in Courtroom 7 West, U.S. Courthouse, 300 South Fourth Street, Minneapolis, MN 55415, or as soon thereafter as counsel may be heard. The hearing on this Motion may be continued from time to time with respect to any particular claim upon notice to, or agreement with, the affected parties.

3. Any response to this Motion must be filed and served by delivery not later than August 4, 2006, which is three (3) days before the time set for the hearing (excluding Saturdays, Sundays and holidays) or filed and served by mail not later August 1, 2006 which is seven (7) days before the time set for the hearing (excluding Saturdays, Sundays and holidays). UNLESS A RESPONSE OPPOSING THIS MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

4. This Court has jurisdiction over this Motion under 28 U.S.C. §§157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This is a core proceeding. The petition commencing these Chapter 7 cases was filed on January 20, 2002. These cases are now pending in this Court.

5. This Motion arises under 11 U.S.C. §704 and Fed. R. Bankr. P. 3007. This Motion is filed under Fed. R. Bankr. P. 9014 and Local Rule 3007-1. The Movant requests relief with respect to his objections to allowance of the claims identified below.

6. The Trustee moves that each claim identified in Exhibits A-1, A-2, and A-3 be disallowed in its entirety on the grounds stated therein.

7. In the event any evidence or testimony is appropriate to be offered at any evidentiary hearing, the Trustee may testify, and may call the claimant or any officer, director, or agent of the claimant or other appropriate person to testify and give evidence.

**WHEREFORE**, the Trustee respectfully requests that the claims which are the subject of this motion be disallowed, the Trustee requests such other and further relief as is just and equitable.

**LEONARD, O'BRIEN  
SPENCER, GALE & SAYRE, LTD.**

/e/ Brian F. Leonard

Dated: June 15, 2006

By \_\_\_\_\_  
Brian F. Leonard, #62236  
Attorneys for Trustee  
100 South Fifth Street, Suite 2500  
Minneapolis, Minnesota 55402-1216  
(612) 332-1030

**VERIFICATION**

I, Brian F. Leonard, the Chapter 7 Trustee, the movant herein, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information and belief.

/e/ Brian F. Leonard

Dated: June 15, 2006

\_\_\_\_\_  
Brian F. Leonard

338472

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

Chapter 7

BKY Case Nos. 02-40284-02-40286

SRC Holding Corporation,  
SRC Investment Corporation,  
Securities Resolution Corporation,

Debtors.

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UNSWORN CERTIFICATE OF SERVICE

I, Stephanie Wood, declare under penalty of perjury that on the 15th day of June, 2006, I mailed a copy of the annexed *Trustee's Motion and First Objection to Claims Identified on Exhibits A-1, A-2 and A-3* on:

SEE ATTACHED SERVICE LIST

by mailing to each party a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at Minneapolis, Minnesota, directed to said party at the address stated above.

/e/ Stephanie Wood

Dated: June 15, 2006

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Stephanie Wood

340683

**SRC Holding Corporation  
SRC Investment Corporation  
Securities Resolution Corporation  
BKY Case Nos.: 02-40284-02-40286**

**SERVICE LIST**

Lewis G. Herrmann  
c/o W. Richard Sintek  
Miller Milove & Kob  
501 W. Broadway, Suite 1600  
San Diego, CA 92101

Lewis and Florence Herrmann  
c/o W. Richard Sintek  
Miller Milove & Kob  
501 W. Broadway, Suite 1600  
San Diego, CA 92101

Lewis G. Herrmann as Trustee of the  
Herrmann Family Trust  
c/o John R. Stoebner, Esq.  
Lapp, Libra, Thomson, et al.  
120 South Sixth Street, Suite 2500  
Minneapolis, MN 55402

U.S. Trust Corporation  
c/o Hill, Farrer & Burrill LLP  
Attn: Steven W. Bacon, Esq.  
300 South Grand Avenue, 37th Floor  
Los Angeles, CA 90071-3147

U.S. Trust Company of Texas, N.A.  
c/o Hill, Farrer & Burrill LLP  
Attn: Steven W. Bacon, Esq.  
300 South Grand Avenue, 37th Floor  
Los Angeles, CA 90071-3147

Winona National Bank  
c/o Phillip Bohl, Esq.  
Gray Plant Mooty  
3400 City Center  
33 South Sixth Street  
Minneapolis, MN 55402

Scott Penwarden  
c/o Johnson Law Group LLP  
Attn: Scott A. Johnson  
10801 Wayzata Blvd., Suite 120  
Minnetonka, MN 55305

Mark F. Augusta  
c/o Robbins & Keehn, APC  
530 "B" Street, Suite 2400  
San Diego, CA 92101

Mark F. Augusta  
c/o Johnson Law Group LLP  
Attn: Scott A. Johnson  
10801 Wayzata Blvd., Suite 120  
Minnetonka, MN 55305

Bruce Talley  
c/o Johnson Law Group LLP  
Attn: Scott A. Johnson  
10801 Wayzata Blvd., Suite 120  
Minnetonka, MN 55305

AZ Department of Revenue  
Attn: James A. Wyett  
Bankruptcy and Litigation Section  
1600 West Monroe  
Phoenix, AZ 85007

Jerome A. Tabolich  
c/o Norman J. Baer, Esq.  
Anthony, Ostlund & Bauer  
90 South Seventh Street, Suite 3600  
Minneapolis, MN 55402

William D. Sexton  
c/o James A. Rubenstein, Esq.  
Moss & Barnett  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

James E. Iverson  
c/o Joseph W. Lawver, Esq.  
Messerli & Kramer P.A.  
150 South Fifth Street, Suite 1800  
Minneapolis, MN 55402

Richard T. Plumstead  
3826 West Calhoun Pkwy.  
Minneapolis, MN 55410

Betker Family Trust  
c/o Daniel M. Harkins, Esq.  
Newport Gateway – Tower 2  
19900 Macarthur Blvd., Suite 850  
Irvine, CA 92612

Betker Partners Three, LP  
c/o Daniel M. Harkins, Esq.  
Newport Gateway – Tower 2  
19900 Macarthur Blvd., Suite 850  
Irvine, CA 92612

Betker Partners One, LP  
c/o Daniel M. Harkins, Esq.  
Newport Gateway – Tower 2  
19900 Macarthur Blvd., Suite 850  
Irvine, CA 92612

Eldridge Family Trust  
c/o Al Van Kampen  
Burkett, Burdette & Van Kampen PLLP  
600 Stewart Street, Suite 305  
Seattle, WA 98101